

# EXHIBIT B

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

WILLIAM HANSON, III

Plaintiff,

v.

LOWE'S HOME CENTERS, INC., et al.

Defendants.

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CIVIL ACTION  
NO. 05-0046 (JJF)


VERIFICATION OF JON WOODHAM

I, Jon Woodham, pursuant to 28 U.S.C. § 1746, state the following based on my personal knowledge:

1. I am the Human Resource Assistant at SPMI. SPMI is human resources outsourcing company which provides human resources services to DDP Holding, Inc. ("DDP").
2. Between October 2003 and January 2004, DDP employed three individuals in the State of Delaware.
3. In January 2004, Jeremy Leaman called me and said that William Hanson had tape recorded a conversation with a Lowe's employee without that employee's permission in violation of Lowe's policy and that because of his conduct, Lowe's no longer wanted Mr. Hanson to service the Dover store.
4. Because DDP is a dedicated vendor to Lowe's, in the event an employee's behavior is such that he is removed from his or her assigned store, DDP has to end the employment relationship.

5. I directed Mr. Leaman to terminate Plaintiff's employment.
6. I did not know Plaintiff's race or national origin to be Asian or Korean
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 12 day of January, 2006

  
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Jon Woodham

